

## **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**Polygon Company  
103 Industrial Park Drive  
Walkerton, Indiana 46574**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 141-10871-00062	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 18, 2001  Expiration Date: April 18, 2006

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary fiberglass reinforced plastic tubing manufacturing source.

Responsible Official:	Charles Mitchell
Source Address:	103 Industrial Park Drive, Walkerton, Indiana 46574
Mailing Address:	P.O. Box 176, Walkerton, Indiana 46574
Phone Number:	219 - 586 - 3145
SIC Code:	3089
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD or Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

### A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

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This fiberglass reinforced plastic tubing manufacturing company consists of two (2) plants:

- (a) Plant 1 is located at 103 Industrial Park Drive, Walkerton, Indiana 46574; and
- (b) Plant 2 is located on Tennessee Street, Walkerton, Indiana 46574.

Because the two (2) plants are owned by one (1) company, are adjacent (0.25 miles apart), have the same SIC codes, and because all products manufactured at Plant 2 are transferred to Plant 1 for final fabrication, they will be considered one (1) source. In addition, both plants were submitted in a single Part 70 application.

### A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

#### Industrial Park Drive Plant

- (a) Ten (10) pultrusion lines, identified as PL1 through PL10, constructed in 1994, with a maximum capacity of 83.8 pounds per hour, exhausting to stacks V2 and V3.
- (b) One (1) spray booth, identified as B1, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity to coat 50 tubes per hour, equipped with dry filters for air pollution control, and exhausting to stacks V4 and V5.
- (c) One (1) gel coat spray booth, identified as B2, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity of 53.5 pounds per hour, equipped with dry filters for air pollution control, and exhausting to stacks V7 and V8.

- (d) One (1) filament winding area, identified as F2, constructed in 1998, with a maximum capacity of 47.0 pounds per hour, emissions are fugitive.

#### **Tennessee Street Plant**

- (e) Nine (9) resin dip tanks, identified as RD1 through RD9, constructed in 1997, with a maximum capacity of 95.0 pounds per hour, exhausting to stack V6.

#### **A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]**

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) One (1) natural gas-fired boiler with heat input of 0.85 MMBtu per hour. [326 IAC 6-2-4]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]
- (c) One (1) fiberglass trimming and grinding area known as the Large Filament Wind Grinding Area, that does not produce fugitive emissions, with PM emissions less than 5 pounds per hour or 25 pounds per day, and equipped with a Torit Donaldson dust collector. [326 IAC 6-3-2]
- (d) One (1) fiberglass trimming and grinding area known as the US6, that does not produce fugitive emissions, with PM emissions less than 5 pounds per hour or 25 pounds per day, and equipped with a Torit Donaldson dust collector. [326 IAC 6-3-2]

#### **A.5 Part 70 Permit Applicability [326 IAC 2-7-2]**

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B

## GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

### B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

**B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.12 Emergency Provisions [326 IAC 2-7-16]**

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-4]**

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

## **Testing Requirements [326 IAC 2-7-6(1)]**

### **C.8 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

##### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6] [326 IAC 2-7-19 (e)]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:

- (1) Indicate estimated actual emissions of criteria pollutants from the source;
- (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

**Stratospheric Ozone Protection**

**C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Fiberglass Reinforced Plastics Operations

#### Industrial Park Drive Plant

- (a) Ten (10) pultrusion lines, identified as PL1 through PL10, constructed in 1994, with a maximum capacity of 83.8 pounds per hour, exhausting to stacks V2 and V3.
- (b) One (1) spray booth, identified as B1, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity to coat 50 tubes per hour, equipped with dry filters for air pollution control, and exhausting to stacks V4 and V5.
- (c) One (1) gel coat spray booth, identified as B2, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity of 53.5 pounds per hour, equipped with dry filters for air pollution control, and exhausting to stacks V7 and V8.
- (d) One (1) filament winding area, identified as F2, constructed in 1998, with a maximum capacity of 47.0 pounds per hour, emissions are fugitive.

#### Tennessee Street Plant

- (e) Nine (9) resin dip tanks, identified as RD1 through RD9, constructed in 1997, with a maximum capacity of 95.0 pounds per hour, exhausting to stack V6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] **Pultrusion Lines**

Use of resins and solvents shall be limited such that the potential to emit (PTE) of Volatile Organic Compounds (VOC) shall be less than 25 tons per consecutive 12 month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6, (New Facilities: General Reduction Requirements), does not apply. Compliance with this limit shall be determined based upon the following criteria:

- (a) Monthly usage by weight, percent volatiles, and method of application shall be recorded for each resin and solvent. Volatile organic compound emissions shall be calculated by multiplying the usage of each resin and solvent by the emission factor that is appropriate for the percent volatiles or monomer content, and the method of application, and summing the emissions for all resins and solvents. Emission factors shall be obtained from a reference approved by IDEM, OAQ.
- (b) The emission factors approved for use by IDEM, OAQ for polyester and vinyl resin shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, for open molding and filament winding, with the exception of the emission factors for controlled spray application. This reference is included with this permit. The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.

**D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] Resin Dip Tanks**

The input volatile organic compound (VOC) usage in the nine (9) resin dip tanks, identified as RD1 through RD9, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

**D.1.3 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]**

- (a) Any change or modification to the Pultrusion Line Surface Coating Operation (B1) which may increase the potential to emit of VOC to 25 tons per year, shall cause 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) to be applicable, and shall require approval from IDEM, OAQ prior to making the change.
- (b) Any change or modification to the Gel Coating Operation (B2) which may increase the potential to emit of VOC to 25 tons per year, shall cause 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) to be applicable, and shall require approval from IDEM, OAQ prior to making the change.
- (c) Any change or modification to the Filament Winding Operation (F2) which may increase the potential to emit of VOC to 25 tons per year, shall cause 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) to be applicable, and shall require approval from IDEM, OAQ prior to making the change.

**D.1.4 New Source Toxics Control [326 IAC 2-4.1-1]**

- (a) Any change or modification to the Pultrusion Line Surface Coating Operation (B1) which may increase the potential to emit to 10 tons per year of any single hazardous air pollutant or twenty-five tons per year of any combination of hazardous air pollutants shall make 326 IAC 2-4.1-1 (New Source Toxics Control) applicable, and shall require approval from IDEM, OAQ prior to making the change.
- (b) Any change or modification to the Gel Coating Operation (B2) which may increase the potential to emit to 10 tons per year of any single hazardous air pollutant or twenty-five tons per year of any combination of hazardous air pollutants shall make 326 IAC 2-4.1-1 (New Source Toxics Control) applicable, and shall require approval from IDEM, OAQ prior to making the change.

**D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]**

Pursuant to CP 141-9132-00059, issued on January 5, 1998, CP 141-10034-00059, issued on October 29, 1998, and pursuant to 326 IAC 6-3-2, the PM from the spray booth, known as B1, and the gel coat booth, known as B2, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

**D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

## **Compliance Determination Requirements**

### **D.1.7 Volatile Organic Compounds (VOC)**

Compliance with the VOC usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

### **D.1.8 VOC Emissions**

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

### **D.1.9 Particulate Matter (PM)**

Pursuant to CP 141-9132-00059, issued on January 5, 1998, and CP 141-10034-00059, issued on October 29, 1998, and in order to comply with Condition D.1.5, the dry filters for PM control shall be in operation at all times when the spray booth, known as B1, and the gel coat booth, known as B2 are in operation.

## **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

### **D.1.10 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth and gel coat booth stacks (B1 and B2) while one (1) or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.1.11 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.1, D.1.2, D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1, D.1.2, D.1.3 and D.1.4.
  - (1) The amount, VOC content and volatile organic HAP content of each resin, gelcoat, paint and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC and volatile organic HAP usage for each month; and
  - (5) The weight of VOCs and volatile organic HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.9 and D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

- (a) One (1) natural gas-fired boiler with heat input of 0.85 MMBtu per hour.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (c) One (1) fiberglass trimming and grinding area known as the Large Filament Wind Grinding Area, that does not produce fugitive emissions, with PM emissions less than 5 pounds per hour or 25 pounds per day, and equipped with a Torit Donaldson dust collector.
- (d) One (1) fiberglass trimming and grinding area known as the US6, that does not produce fugitive emissions, with PM emissions less than 5 pounds per hour or 25 pounds per day, and equipped with a Torit Donaldson dust collector.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions from the 0.85 MMBtu per hour heat input boiler shall be limited to 0.60 pounds per MMBtu heat input. 326 IAC 6-2-4 states that for a maximum operating capacity less than 10 MMBtu, that the emissions shall be limited to 0.60 pounds per MMBtu heat input. Therefore, no calculations were required.

#### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.



#### **D.2.4 Particulate Matter (PM) [326 IAC 6-3-2]**

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Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the fiberglass trimming and grinding area known as US6 shall not exceed 1.029 pounds per hour when operating at a process weight rate of 254 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### **Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

#### **D.2.5 Particulate Matter (PM)**

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In order to comply with Conditions C.1 and D.2.3, the Torit Donaldson dust collectors for PM control shall be in operation at all times when the Large Filament Wind Grinding Area and the fiberglass trimming and grinding area known as US6 are in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Polygon Company  
Source Address: 103 Industrial Park Drive, Walkerton, Indiana 46574  
Mailing Address: P.O. Box 176, Walkerton, Indiana 46574  
Part 70 Permit No.: T 141-10871-00062

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) \_\_\_\_\_

9 Report (specify) \_\_\_\_\_

9 Notification (specify) \_\_\_\_\_

9 Affidavit (specify) \_\_\_\_\_

9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Polygon Company  
Source Address: 103 Industrial Park Drive, Walkerton, Indiana 46574  
Mailing Address: P.O. Box 176, Walkerton, Indiana 46574  
Part 70 Permit No.: T 141-10871-00062

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C** The Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - C** The Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Polygon Company  
Source Address: 103 Industrial Park Drive, Walkerton, Indiana 46574  
Mailing Address: P.O. Box 176, Walkerton, Indiana 46574  
Part 70 Permit No.: T 141-10871-00062  
Facility: Pultrusion Lines, Identified as PL1 through PL10  
Parameter: Volatile Organic Compounds (VOC)  
Limit: Use of resins and solvents shall be limited such that the potential to emit (PTE) of Volatile Organic Compounds (VOC) shall be less than 25 tons per consecutive 12 month period.

Monthly usage by weight, percent volatiles, and method of application shall be recorded for each resin and solvent. Volatile organic compound emissions shall be calculated by multiplying the usage of each resin and solvent by the emission factor that is appropriate for the percent volatiles or monomer content, and the method of application, and summing the emissions for all resins and solvents. Emission factors shall be obtained from a reference approved by IDEM, OAQ.

The emission factors approved for use by IDEM, OAQ for polyester and vinyl resin shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, for open molding and filament winding, with the exception of the emission factors for controlled spray application. This reference is included with this permit. The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Polygon Company  
Source Address: Tennessee Street, Walkerton, Indiana 46574  
Mailing Address: P.O. Box 176, Walkerton, Indiana 46574  
Part 70 Permit No.: T 141-10871-00062  
Facility: Resin dip tanks, identified as RD1 through RD9  
Parameter: Volatile Organic Compounds (VOC)  
Limit: Less than 25 tons input usage per consecutive twelve (12) month period.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Polygon Company  
Source Address: Tennessee Street, Walkerton, Indiana 46574  
Mailing Address: P.O. Box 176, Walkerton, Indiana 46574  
Part 70 Permit No.: T 141-10871-00062

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

Page 2 of 2

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## **Indiana Department of Environmental Management Office of Air Management**

### **Technical Support Document (TSD) for a Part 70 Operating Permit**

#### **Source Background and Description**

<b>Source Name:</b>	<b>Polygon Company</b>
<b>Source Location:</b>	<b>103 Industrial Park Drive, Walkerton, Indiana 46574</b>
<b>County:</b>	<b>St. Joseph</b>
<b>SIC Code:</b>	<b>3089</b>
<b>Operation Permit No.:</b>	<b>T 141-10871-00062</b>
<b>Permit Reviewer:</b>	<b>Patrick T. Brennan</b>

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Polygon Company relating to the operation of a fiberglass reinforced plastic tubing manufacturing source.

#### **Source Definition**

This fiberglass reinforced plastic tubing manufacturing company consists of two (2) plants:

- (a) Plant 1 is located at 103 Industrial Park Drive, Walkerton, Indiana 46574; and
- (b) Plant 2 is located on Tennessee Street, Walkerton, Indiana 46574.

Because the two (2) plants are owned by one (1) company, are adjacent (0.25 miles apart), have the same SIC codes, and because all products manufactured at Plant 2 are transferred to Plant 1 for final fabrication, they will be considered one (1) source. In addition, both plants were submitted in a single Part 70 application.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

##### **Industrial Park Drive Plant**

- (a) Ten (10) pultrusion lines, identified as PL1 through PL10, with a maximum capacity of 83.8 pounds per hour, exhausting to stacks V2 and V3.
- (b) One (1) spray booth, identified as B1, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity to coat 50 tubes per hour, equipped with dry filters for air pollution control, and exhausting to stacks V4 and V5.
- (c) One (1) gel coat spray booth, identified as B2, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity of 53.5 pounds per hour, equipped with dry filters for air pollution control, and exhausting to stacks V7 and V8.
- (d) One (1) filament winding area, identified as F2, with a maximum capacity of 47.0 pounds per hour, emissions are fugitive.

### **Unpermitted Emission Units and Pollution Control Equipment**

The source also consists of the following unpermitted facilities/units:

#### **Tennessee Street Plant**

- (e) Nine (9) resin dip tanks, identified as RD1 through RD9, with a maximum capacity of 95.0 pounds per hour, exhausting to stack V6.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
  - (1) One (1) 0.85 MMBtu per hour boiler.
  - (2) Natural gas fired curing ovens.
  - (3) Various space heaters and air makeup units.
- (b) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (d) Paved and unpaved roads and parking lots with public access.
- (e) One (1) fiberglass trimming and grinding area known as the Large Filament Wind Grinding Area, that does not produce fugitive emissions, with PM emissions less than 5 pounds per hour or 25 pounds per day, and equipped with a Torit Donaldson dust collector.
- (f) One (1) fiberglass trimming and grinding area known as the US6, that does not produce fugitive emissions, with PM emissions less than 5 pounds per hour or 25 pounds per day, and equipped with a Torit Donaldson dust collector.
- (g) Electric ovens for fiberglass curing and drying, emitting less than 12.5 pounds per day of any combination of HAPs.
- (h) Particulate emissions from the pultrusion area of less than 5 pounds per hour or 25 pounds per day, controlled by a baghouse dust collector.

### **Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 141-10380-00059, issued on January 22, 1999; and
- (b) CP 141-10034-00059, issued on October 29, 1998; and
- (c) CP 141-9132-00059, issued on January 5, 1998; and
- (d) CP 141-3706-00059, issued on August 5, 1994.

All conditions from previous approvals were incorporated into this Part 70 permit.

The source has also been issued two previous approvals which have been superceded by the above listed permits, and are no longer valid. These permits are:

- (a) CP 141-2991-00062, issued on November 19, 1993; and
- (b) CP 141-2839-00059, issued on March 29, 1993.

No conditions from these approvals were incorporated into this Part 70 permit.

Note: There has been some confusion in past permits regarding the proper plant identification number. The correct plant identification number for the 103 Industrial Park Drive plant is 00062. This number will now be used to represent the combined facilities from Tennessee Street and Industrial Park Drive that are covered by this permit.

### **Enforcement Issue**

- (a) IDEM is aware that equipment has been constructed and/or operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

### **Recommendation**

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on April 16, 1999. Additional information was received on August 31, 2000.

There was no notice of completeness letter mailed to the source.

### **Emission Calculations**

See Appendix A, pages 1 and 2 of 2, of this document for detailed emissions calculations.

### **Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	4.33
PM <sub>10</sub>	4.33
SO <sub>2</sub>	0.0
VOC	89.0
CO	0.0
NO <sub>x</sub>	0.0

Note: For the purpose of determining Title V applicability for particulates, PM<sub>10</sub>, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Styrene	29.3
Toluene	1.13
Ethyl Benzene	0.003
Xylene	0.577
MEK	3.37
MIBK	0.007
TOTAL	34.4

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 emissions data submitted by the applicant with the Title V permit application.

<b>Pollutant</b>	<b>Actual Emissions (tons/year)</b>
PM	0.12
PM <sub>10</sub>	0.12
SO <sub>2</sub>	0.0
VOC	51.45
CO	0.0
NO <sub>x</sub>	0.0
Styrene	21.3
MEK	0.376
Toluene	0.230
Xylene	0.410
Toluene Diisocyanate	0.001
Ethyl Benzene	0.050
MIBK	0.140
Dimethylphthalate	0.090

#### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

	<b>Limited Potential to Emit (tons/year)</b>						
<b>Process/facility</b>	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>2</sub></b>	<b>VOC</b>	<b>CO</b>	<b>NO<sub>x</sub></b>	<b>HAPs</b>
Pultrusion (P1 - P10)	0.0	0.0	0.0	less than 25.0	0.0	0.0	15.3
Pultrusion Line Surface Coating (B1)	0.419	0.419	0.0	8.47	0.0	0.0	5.09
Resin Dip (RD1 - RD9)	0.0	0.0	0.0	less than 25.0	0.0	0.0	0.0
Gelcoating (B2)	0.046	0.046	0.0	4.69	0.0	0.0	4.69
Filament Winding (F2)	0.0	0.0	0.0	9.55	0.0	0.0	0.0
Insignificant Activities	1.30	1.30	0.026	1.00	3.68	4.38	0.0
<b>Total Emissions</b>	<b>1.77</b>	<b>1.77</b>	<b>0.026</b>	<b>73.7</b>	<b>3.68</b>	<b>4.38</b>	<b>25.1</b>

### County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as maintenance or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) St. Joseph County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Federal Rule Applicability

- (a) This Part 70 application was received on April 16, 1999, but does not involve a pollutant-specific emissions unit with the potential to emit after control in an amount equal to or greater than one hundred (100) tons per year. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.

- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source. Because the source has a degreasing operation that is an insignificant activity, 40 CFR Part 60, Subpart T (National Emission Standards for Halogenated Solvent Cleaning) could be applicable. However, because the degreasing operation uses no halogenated HAP solvents, 40 CFR Part 60, Subpart, T is not applicable.

#### **State Rule Applicability - Entire Source**

##### **326 IAC 2-2 (Prevention of Significant Deterioration)**

This source is not subject to 326 IAC 2-2 (Prevention of Significant Deterioration) because it is not in one of the 28 listed source categories and the total source potential emissions of all criteria pollutants are less than 250 tons each per 12 consecutive month period.

##### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

##### **326 IAC 5-1 (Opacity Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

##### **326 IAC 6-1 (Nonattainment Area Particulate Limitations)**

Because the source is located in St. Joseph County, it is subject to 326 IAC 6-1 (Nonattainment Area Particulate Limitations). However, because the potential to emit of PM for the source is less than 100 tons per year, and actual PM emissions are less than 10 tons per year, 326 IAC 6-1 is not applicable. Therefore, allowable PM emissions have been determined using 326 IAC 6-3-2.

#### **State Rule Applicability - Individual Facilities**

##### **326 IAC 2-4.1-1 (New Source Toxics Control)**

- (a) All facilities in the Pultrusion Line (PL1 - PL10) at the Industrial Park Drive plant were permitted under CP 141-3706-00059, issued on August 5, 1994. Because this permit was issued prior to July 27, 1997, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply.
- (b) All facilities in the Pultrusion Line Surface Coating Operation (B1) at the Industrial Park Drive plant were permitted under CP 141-9132-00059, issued on January 5, 1998. Because this permit was issued after July 27, 1997, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) could apply. However, because the potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination HAPs is less than twenty-five (25) tons per year, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply.
- (c) All facilities in the Resin Dip (R1 - RD9) process at the Tennessee Street plant were constructed in 1997. Because there are no HAPs emitted from this process, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply.
- (d) All facilities in the Gel Coating Operation (B2) at the Industrial Park Drive plant were permitted under CP 141-10034-00059, issued on October 29, 1998. Because this permit was issued after July 27, 1997, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) could apply. However, because the potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination HAPs is less than twenty-five (25) tons per year, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply.
- (e) All facilities in the Filament Winding Operation (F2) at the Industrial Park Drive plant were permitted under CP 141-10034-00059, issued on October 29, 1998. Because this permit was issued after July 27, 1997, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) could apply. However, because there are no HAPs emitted from this process, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply.

#### 326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) emissions from the Pultrusion Line Surface Coating Operation (B1) and the Gel Coating Operation (B2) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour, and} \\ P = \text{process weight rate in tons per hour.}$$

Compliance will be demonstrated by operating the dry filters at all times when these coating processes are in operation.

#### 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

- (a) All facilities in the Pultrusion Line (PL1 - PL10) at the Industrial Park Drive plant were permitted under CP 141-3706-00059, issued on August 5, 1994. At that time, potential VOC emissions from the process were calculated using emission factors from U.S. EPA's AP-42 document. These calculations showed that potential VOC emissions were less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 (New facilities; General reduction requirements), did not apply.

In the time since the issuance of CP 141-3706-00059, additional research on VOC and HAPs emissions from fiberglass reinforced plastics has been conducted by the Composites Fabricators Association (CFA). This has resulted in a new emissions model contained in the report "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Associations, April 20, 1999. This document contains revised emission factors for the filament winding process, which when applied which when applied to the Pultrusion Line (P1) at the Industrial Park Drive plant, produce potential VOC emissions of 40.4 tons per year. Therefore, the requirements of 326 IAC 8-1-6 (New facilities; General reduction requirements), are now applicable, and Best Available Control Technology (BACT) is required for this facility. However, because the source has agreed to limit emissions of volatile organic compounds from this facility to less than 25 tons per 12 consecutive month period, 326 IAC 8-1-6 is not applicable.

The VOC emissions estimate of 40.4 tons per year does not represent an increase in actual emissions or a capacity increase at the source. It is the result of a revised methodology used to calculate plant emissions.

- (b) Because the Pultrusion Line Surface Coating Operation (B1) at the Industrial Park Drive plant applies coatings to plastic substrates, commenced operation after January 1, 1980, and is governed by no other provisions of Article 8, the requirements of 326 IAC 8-1-6 (New facilities; General reduction requirements) may be applicable. Potential emissions of volatile organic compounds from this facility are 8.47 tons per year. Because these potential VOC emissions are less than 25 tons per year, 326 IAC 8-1-6 is not applicable.
- (c) Because the Gel Coating Operation (B2) at the Industrial Park Drive plant produces fiberglass reinforced plastic products, commenced operation after January 1, 1980, and is governed by no other provisions of Article 8, the requirements of 326 IAC 8-1-6 (New facilities; General reduction requirements) may be applicable. Potential emissions of volatile organic compounds from this facility are 4.69 tons per year. Because these potential VOC emissions are less than 25 tons per year, 326 IAC 8-1-6 is not applicable.
- (d) Because the Filament Winding Operation (F2) at the Industrial Park Drive plant produces fiberglass reinforced plastic products, commenced operation after January 1, 1980, and is governed by no other provisions of Article 8, the requirements of 326 IAC 8-1-6 (New facilities; General reduction requirements) may be applicable. Potential emissions of volatile organic compounds from this facility are 9.55 tons per year. Because these potential VOC emissions are less than 25 tons per year, 326 IAC 8-1-6 is not applicable.
- (e) Because the Resin Dip (R1 - RD9) process at the Tennessee Street plant produces fiberglass reinforced plastic products, commenced operation after January 1, 1980, is governed by no other provisions of Article 8, and has potential emissions of volatile organic compounds greater than 25 tons per year, the requirements of 326 IAC 8-1-6 (New facilities; General reduction requirements) are applicable. However, because the source has agreed to limit emissions of volatile organic compounds from this facility to less than 25 tons per 12 consecutive month period, 326 IAC 8-1-6 is not applicable.

#### **State Rule Applicability - Insignificant Activities**

326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d))

The boiler, rated at 0.85 million British thermal units per hour, was installed after September 21, 1983, and is subject to the requirements of this rule that limits PM emissions as follows:

$$P_t = \frac{1.09}{Q^{0.26}}$$

Where:

$P_t$  = Pounds of particulate matter emitted per million British thermal units.

$Q$  = Total source maximum operating capacity rating in million British thermal units heat input. The maximum operating capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used.

$$P_t = \frac{1.09}{(0.85)^{0.26}} = 1.137 \text{ pounds per million British thermal units.}$$

326 IAC 6-2-4 also states that for  $Q$  less than 10 mmBtu per hour,  $P_t$  shall not exceed 0.6 pounds of particulate matter emitted per million British thermal units. Therefore, this is the controlling value.

The worst case potential PM emissions for this boiler rated at 0.85 million British thermal units per hour are 0.0283 tons per year or 0.0076 pounds per million British thermal units. The boiler therefore complies with this rule.

#### 326 IAC 6-3-2 (Process Operations)

- (a) The particulate matter (PM) emissions from fiberglass trimming and grinding area known as the US6 will be limited to 1.029 pounds per hour when operating at a process weight rate 254 pounds per hour.

The pounds per hour limitation was calculated from the following equation.

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour, and} \\ P = \text{process weight rate in tons per hour.}$$

$$E = 4.10 (0.127 \text{ tons/hr})^{0.67} = 1.029 \text{ pounds per hour.}$$

Compliance will be demonstrated by operating the Torit Donaldson dust collector at all times when trimming and grinding operations are taking place.

- (b) The Large Filament Wind Grinding Area has a process weight rate of 17 pounds per hour. Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

Compliance will be demonstrated by operating the Torit Donaldson dust collector at all times when trimming and grinding operations are taking place.

#### 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

### Testing Requirements

Testing is not required at this source because emissions estimates are based upon the "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Associations, April 20, 1999, and applicant supplied Material Safety Data Sheets (MSDS).

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters at the paint booth(B1) and the gel coat booth (B2). The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks from the paint booth(B1) and the gel coat booth (B2), and the presence of overspray on the rooftops and the nearby ground, weather permitting. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Weekly visible emission notations of the paint booth (B1) and gel coat booth (B2) stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
  - (1) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (2) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (3) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (4) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the gel coat and surface coating operations must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

## Conclusion

The operation of this fiberglass reinforced plastic tubing manufacturing source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 141-10871-00062**.

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for a Part 70 Operating Permit

<b>Source Name:</b>	<b>Polygon Company</b>
<b>Source Location:</b>	<b>103 Industrial Park Drive, Walkerton, Indiana 46574</b>
<b>County:</b>	<b>St. Joseph</b>
<b>SIC Code:</b>	<b>3089</b>
<b>Operation Permit No.:</b>	<b>T 141-10871-00062</b>
<b>Permit Reviewer:</b>	<b>Patrick T. Brennan</b>

On November 6, 2000, the Office of Air Management (OAM) had a notice published in the South Bend Tribune, South Bend, Indiana, stating that Polygon Company had applied for a Part 70 Operating Permit to operate a fiber reinforced plastic tubing manufacturing source with dry filters for air pollution control. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

#### **Office of Air Quality**

1. As of January 1, 2001, the name of the Office of Air Management (OAM) has been changed to the Office of Air Quality (OAQ). All references in the permit to OAM have been changed to OAQ.
2. Condition D.2.2 (Volatile Organic Compounds, Cold Cleaner Operations) has been added to the permit. All other Section D.2 conditions have been renumbered accordingly. This additional condition is as follows:

#### **D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]**

**Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:**

- (a) **Equip the cleaner with a cover;**
- (b) **Equip the cleaner with a facility for draining cleaned parts;**
- (c) **Close the degreaser cover whenever parts are not being handled in the cleaner;**
- (d) **Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;**
- (e) **Provide a permanent, conspicuous label summarizing the operation requirements;**
- (f) **Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.**

**Appendix A: Potential Emissions Calculations**  
**VOC and Particulate**  
**From Surface Coating Operations**

**Company Name:** Polygon Company  
**Address City IN Zip:** 103 Industrial Park Drive, Walkerton, Indiana 46574  
**Title V:** 141-10871  
**Plt ID:** 141-00062  
**Reviewer:** Patrick T. Brennan  
**Date:** April 16, 1999

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	Transfer Efficiency
<b>P1 - Pultrusion Line</b>																
Epoxy A	9.76	1.00%	0.00%	1.00%	0.00%	99.20%	0.061475	10.00	1.000	0.10	0.10	0.06000	1.44	0.26	0.00	100%
Epoxy B	9.97	1.00%	0.00%	1.00%	0.00%	99.00%	0.060181	10.00	1.000	0.10	0.10	0.06000	1.44	0.26	0.00	100%
Vinyl Resin	8.92	40.00%	0.00%	40.00%	0.00%	52.40%	0.067265	10.00	0.200	3.57	3.57	0.480	11.52	2.10	0.00	100%
Dion(R) Resin with added Styrene	9.05	53.37%	0.00%	53.37%	0.00%	38.70%	0.469400	10.00	0.220	4.83	4.83	4.992	119.82	21.87	0.00	100%
Peroxide	7.26	95.30%	0.00%	95.30%	0.00%	10.00%	0.005510	10.00	1.000	6.92	6.92	0.381	9.15	1.67	0.00	100%
S2488	8.88	100.00%	0.00%	100.00%	0.00%	0.00%	0.016892	10.00	1.000	8.88	8.88	1.500	36.00	6.57	0.00	100%
S210	8.99	100.00%	0.00%	100.00%	0.00%	0.00%	0.019466	10.00	1.000	8.99	8.99	1.750	42.00	7.66	0.00	100%
<b>Total</b>														<b>40.40</b>		
<b>B1 - Pultrusion Line Surface Coating</b>																
Polane Enamel	8.76	60.20%	0.00%	60.20%	0.00%	26.48%	0.0004569	800.00	1.00	5.27	5.27	1.93	46.26	8.44	2.79	50%
Polane Reducer	7.04	100.00%	0.00%	100.00%	0.00%	0.00%	0.001	1.00	1.00	7.04	7.04	0.01	0.17	0.03	0.00	100%
<b>Total</b>														<b>8.47</b>		
<b>R1 - Resin Dip</b>																
Epoxy A	9.76	1.00%	0.00%	1.00%	0.00%	99.20%	0.512296	9.00	1.00	0.10	0.10	0.45	10.80	1.97	0.00	100%
Epoxy B	9.97	1.00%	0.00%	1.00%	0.00%	99.00%	0.501504	9.00	1.00	0.10	0.10	0.45	10.80	1.97	0.00	100%
IPA - Anhydrous	6.58	100.00%	0.00%	100.00%	0.00%	0.00%	0.084431	9.00	1.00	6.58	6.58	5.00	120.00	21.90	0.00	100%
<b>Total</b>														<b>25.84</b>		
<b>B2 - Gel Coating</b>																
Gelcoat	9.18	53.22%	0.00%	53.22%	0.00%	37.00%	0.327	1.000	0.67	4.89	4.89	1.07	25.67	4.69	1.54	75%
Acetone	6.57	100.00%	100.00%	0.00%	100.00%	0.00%	0.076	1.000	1.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
<b>Total</b>														<b>4.69</b>		
<b>F2 - Filament Winding</b>																
Epoxy A	9.76	1.00%	0.00%	1.00%	0.00%	99.20%	0.92213	1.000	1.00	0.10	0.10	0.09	2.16	0.39	0.00	100%
Epoxy B	9.97	1.00%	0.00%	1.00%	0.00%	99.00%	0.90271	1.000	1.00	0.10	0.10	0.09	2.16	0.39	0.00	100%
S2488	8.88	100.00%	0.00%	100.00%	0.00%	0.00%	0.22523	1.000	1.00	8.88	8.88	2.00	48.00	8.76	0.00	100%
<b>Total</b>														<b>9.55</b>		
											<b>Source Total:</b>	<b>20.31</b>	<b>487.39</b>	<b>88.95</b>	<b>4.33</b>	

Control Efficiency		Controlled	Controlled	Controlled	Controlled
VOC	PM	VOC pounds	VOC pounds	VOC	Particulate
	<b>85% and 97%</b>	per hour	per day	tons/yr	tons/yr
<b>TOTAL:</b>		<b>20.31</b>	<b>487.39</b>	<b>88.95</b>	<b>0.46</b>

Controlled Emissions due to Surface Coating Operations and Controls

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* Flash-off

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day) \* Flash-off

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs) \* Flash-off

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids) \* Flash-off

Total = Worst Coating + Sum of all solvents used

Flashoff factors for gel coat and resin = CFA Factor (lbs/ton)/(2000 \* weight fraction monomer)

### HAP Emission Calculations

TV#: 141-10871  
Plt ID#: 141-00062

Company Name: Polygon Company  
Plant Location: 103 Industrial Park Drive, Walkerton, Indiana 46574  
County: St. Joseph  
Permit Reviewer: Patrick T. Brennan  
Date: April 16, 1999

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Styrene	Weight % Toluene	Weight % Ethyl Benzene	Weight % Xylene	Weight % MEK	Weight % MIBK	Styrene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Xylene Emissions (tons/yr)	MEK Emissions (tons/yr)	MIBK Emissions (tons/yr)
<b>P1 - Pultrusion Line</b>																
Epoxy A	9.76	0.061475	10.00	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Epoxy B	9.97	0.060181	10.00	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Vinyl Resin	8.92	0.067265	10.00	0.200	40.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.10	0.00	0.00	0.00	0.00	0.00
Dion(R) Resin	9.17	0.436205	10.00	0.220	52.00%	0.00%	0.00%	0.00%	0.00%	0.00%	20.06	0.00	0.00	0.00	0.00	0.00
Peroxide	7.26	0.005510	10.00	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Styrene	7.53	0.033201	10.00	0.220	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.41	0.00	0.00	0.00	0.00	0.00
S2488	8.88	0.016892	10.00	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
S210	8.99	0.019466	10.00	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>											<b>24.57</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>B1 - Pultrusion Line Surface Coating</b>																
Polane Enamel	8.76	0.0004569	800.00	1.00	0.00%	8.00%	0.00%	4.00%	24.00%	0.00%	0.00	1.12	0.000	0.56	3.37	0.00
Polane Reducer	7.04	0.001	1.00	1.00	0.00%	15.00%	9.00%	52.00%	0.00%	24.00%	0.00	0.005	0.003	0.02	0.00	0.01
<b>Total</b>											<b>0.00</b>	<b>1.13</b>	<b>0.003</b>	<b>0.58</b>	<b>3.37</b>	<b>0.01</b>
<b>R1 - Resin Dip</b>																
Epoxy A	9.76	0.512296	9.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Epoxy B	9.97	0.501504	9.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
IPA - Anhydrous	6.58	0.084431	9.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>											<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>B2 - Gel Coating</b>																
Gelcoat	9.18	0.327	1.000	0.67	53.22%	0.00%	0.00%	0.00%	0.00%	0.00%	4.69	0.00	0.00	0.00	0.00	0.00
Acetone	6.57	0.076	1.000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>											<b>4.69</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>F2 - Filament Winding</b>																
Epoxy A	9.76	0.92213	1.000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Epoxy B	9.97	0.90271	1.000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
S2488	8.88	0.22523	1.000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>											<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>TOTAL:</b>																
											<b>(tons/yr):</b>	<b>29.26</b>	<b>1.13</b>	<b>0.003</b>	<b>0.577</b>	<b>0.007</b>

#### METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs  
Flashoff factors for gel coat and resin = CFA Factor (lbs/ton)/(2000 \* weight fraction monomer)

Total HAPs = 34.34 Tons Per Year